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**From:** Keith Raniere <[REDACTED]>  
**Sent:** Wednesday, December 21, 2016 10:29 PM  
**To:** Clare Bronfman  
**Subject:** Re: Fwd: Notice of Gift

I don't have the money yet to make this gift... I won't even be able to assess that for a while... but Pam had a desire to make this gift which can be done from her estate or something like that...

On Wednesday, December 21, 2016 4:30 PM, Clare Bronfman <[REDACTED]> wrote:

Begin forwarded message:

**From:** John Sandweg <[REDACTED]>  
**Subject:** Fwd: Notice of Gift  
**Date:** December 21, 2016 at 3:42:58 PM EST  
**To:** Clare Bronfman <[REDACTED]>  
**Cc:** Matt Burbach <[REDACTED]>

Great-

Looping in Clare here.

Clare - let us know if you want to discuss the options. The more safeguards we place on the gift, the more scrutiny we will face from USCIS. This iteration is essentially a straight transfer.

JS

----- Forwarded message -----

**From:** Matt Burbach <[REDACTED]>  
**Date:** Wed, Dec 21, 2016 at 7:46 PM  
**Subject:** Notice of Gift  
**To:** John Sandweg <[REDACTED]>

John,

Attached please find a draft Notice of Gift, from Keith Raniere to [REDACTED] We need a few more items of information to complete, but this is pretty straightforward. This does not require a particular use of the funds, but as discussed we run risks of disapproval by CIS if we draft it as a gift and prescribe the use of funds.

That said, let's think about whether we want to draw up a two-step process – we prepare the gift documents and an escrow agreement. The gift is wired to [REDACTED] and the parties sign the Notice of Gift at the same time that [REDACTED], EB-5 Fund and Escrow Agent sign an escrow agreement providing that the funds are to be deposited into [REDACTED]'s account and then into the escrow.

Alternative #2, we provide an escrow into which Keith deposits the funds now and upon identifying an EB-5 project, the funds are released by Keith to [REDACTED] as a gift.

Matt

Matthew C. Burbach  
Burbach Law LLC  
[REDACTED]

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John Sandweg  
[REDACTED]

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